

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

*In the Matter of the Joint Application of Verizon Communications Inc. and Frontier
Communications Corporation For An Order Declining to Assert Jurisdiction Over, or, in the
Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.*

Docket No. UT-090842

PUBLIC COUNSEL'S RESPONSE TO JOINT APPLICANTS
DATA REQUEST NO. 99

Request No: 99
Directed to: Public Counsel
Date received: November 4, 2009
Prepared by: Trevor R. Roycroft
Date prepared: November 12, 2009

Joint Applicants Data Request No. 99

On page 91 of the Testimony, Dr. Roycroft recommends establishing a fund of \$40 million to insure the condition of Verizon's outside plant. Please explain how Dr. Roycroft determined that \$40 million was appropriate and provide all documents related to the determination.

RESPONSE:

Dr. Roycroft provides an explanation in footnote 192 of his direct testimony, Exhibit No. __ (TRR-1HCT). Please see the documents referenced in footnote 192, including Verizon and Frontier estimates of expanding DSL service, which are in the Joint Applicants' possession. In addition, please see "Capital_Exenditures_Highly_Confidential.xls," provided in Dr. Roycroft's filed workpapers.